

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

JOHN DOE 1,)	CASE NO. 1:22-cv-02139
)	
Plaintiff,)	JUDGE PAMELA A. BARKER
)	
vs.)	
)	
Varsity Brands, LLC, <i>et al.</i> ,)	
)	
Defendants.)	

**JOINT MOTION TO SET STIPULATED BRIEFING
SCHEDULE IN RESPONSE TO PLAINTIFF'S COMPLAINT**

NOW COME Plaintiff John Doe 1 (“Plaintiff”) and Defendant USA Federation of Sport Cheering d/b/a USA Cheer (“USA Cheer”) (collectively, the “Parties”) and hereby respectfully move the Court to set a stipulated briefing schedule in response to Plaintiff’s Complaint to align with the stipulated briefing schedule requested by the Plaintiff and Defendants Varsity Brands, LLC, Varsity Brands Holding Company, Inc., Varsity Spirit, LLC, Bain Capital, LP, Charlesbank Capital Partners, LP, and Jeff Webb (the “Moving Defendants”) and granted by the Court as follows:

1. USA Cheer shall answer or otherwise move in response to the Complaint on or before **February 24, 2023**.
2. Plaintiff shall oppose any motion filed by USA Cheer in response to the Complaint on or before **March 24, 2023**.
3. USA Cheer shall reply in support of any motion in response to the Complaint on or before **April 7, 2023**.

Pursuant to Fed. R. Civ. P. 6(b)(1)(A), good cause exists to extend the time for USA Cheer to respond to the Complaint and set a briefing schedule as requested herein for the same reasons set forth in the Joint Motion to Set Stipulated Briefing Schedule in Response to Plaintiff's Complaint filed on December 22, 2022 [ECF #21.] There are ten other related cases in five other federal district courts that have been filed, which contain many overlapping causes of action and present similar complex claims for relief, including claims pursuant to the Racketeer Influenced Corrupt Organizations Act and the Protecting Young Victims from Sexual Abuse and Safe Sport Authorization Act of 2017, against USA Cheer and other defendants. As requested herein, briefing in response to the Complaint would take place once briefing is completed in the first-filed and related actions pending in the District Court for the District of South Carolina.

Additionally, this Court has already set the above-requested briefing schedule for six of the defendants in this case. *See* 2022.12.27 Order granting Joint Motion of Moving Defendants. To streamline and coordinate this complex litigation, the Parties have reached agreement for USA Cheer to join the stipulated briefing schedule already set by this Court.

One prior extension has been sought and granted to USA Cheer in connection with responding to the Complaint. On December 20, 2022, Plaintiff and USA Cheer filed a Stipulated Extension of Deadline to Respond for Defendant USA Federation for Sport Cheering d/b/a USA Cheer [ECF #17] making USA Cheer's responsive deadline January 18, 2023.

Stipulated and agreed to by:

Date: December 29, 2022

/s/ Chelsea C. Weaver

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*Attorneys for Defendant USA
Federation for Sport Cheering d/b/a
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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing *Joint Motion to Set Stipulated Briefing Schedule in Response to Plaintiff's Complaint* was electronically filed electronically this 29th day of December 2022. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

/s/ Royce R. Remington
One of the Attorneys for Defendant USA
Federation for Sport Cheering d/b/a USA Cheer